

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-CR-470 JB

COURTNEY FRANK,

Defendant.

**DEFENDANT’S UNOPPOSED MOTION TO MODIFY CONDITIONS OF
RELEASE**
(To be ruled on by a Magistrate)

Courtney Frank, through undersigned appointed counsel, moves the court to issue an order modifying her conditions of release, specifically removing the condition requiring her to wear a location monitoring technology.

As grounds counsel state:

1. On April 27, 2023, Ms. Courtney Frank pleaded not guilty to the charges in the indictment in this matter. On that date Ms. Frank was released with conditions to the third-party custody of her mother, Devona Nez. Ms. Frank has been in full compliance with all her conditions since her release.

2. Pretrial Officer Ms. Rachel Hobbs has been supervising Ms. Frank since her release. One condition imposed on April 27 was that Ms. Frank’s location be monitored via technology. Officer Hobbs has determined this condition is no longer necessary for Ms. Frank.

3. Ms. Frank now asks the Court to modify her conditions by removing the condition of location monitoring technology that appears at ¶7(q) in her current order of conditions of release. ECF Doc. 15.

4. Pretrial Officer Rachel Hobbs is aware of this request and supports removing the condition requiring location monitoring.

5. Assistant United States Attorney Zachary C. Jones does not oppose the requested modification to Ms. Frank's conditions of release.

WHEREFORE, Ms. Courtney Frank, by and through undersigned counsel, respectfully requests that this Court issue an order modifying her conditions of release by removing the condition requiring location monitoring.

Respectfully Submitted,

FEDERAL PUBLIC DEFENDER

111 Lomas NW, Suite 501

Albuquerque, NM 87102

(505) 346-2489

Jim_loonam@fd.org

Electronically filed August 8, 2023

/s/ James C. Loonam

Assistant Federal Public Defender

Attorney for Ms. Frank